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**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of:

ALICIA BESTWICK
49373 Aspen Drive
Morongo Valley, CA 92256

Registered Nurse License No. 467434

Respondent.

Case No. 2005-34

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties that
the following matters are true:

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of
the Board of Registered Nursing, who brought this action solely in her official capacity.

2. Alicia Bestwick (Respondent), is a probationary registered nurse.

JURISDICTION

3. On June 17, 2005, the Board of Registered Nursing adopted Stipulated
Settlement and Disciplinary Order No. 2005-34, which became effective on July 18, 2005. The
Stipulated Settlement and Disciplinary Order requires, inter alia, the respondent to serve a three-
year probation term that includes Probation Conditions # 1-15. The Stipulated Settlement and
Disciplinary Order is attached as exhibit A and incorporated herein by reference.

Condition #13 of the Stipulated Settlement and Disciplinary Order allows
the Board of Registered Nursing to accept the surrender of the respondent's license if she ceases
practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
probation.

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11. Respondent shall cause to be delivered to the Board both her wall and pocket license certificate on or before the effective date of the Decision and Order.

12. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed.

13. Respondent shall not apply for licensure or petition for reinstatement for one year from the effective date of the Board of Registered Nursing's Decision and Order.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 6-26-08

Alicia Bestwick
ALICIA BESTWICK
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully accepted by Ruth Ann Terry, Executive Officer for the Board of Registered Nursing.

DATED: 7/1/08

Ruth Ann Terry
RUTH ANN TERRY
Executive Officer
BOARD OF REGISTERED NURSING

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**BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of:

Case No. 2005-34

ALICIA BESTWICK
49373 Aspen Drive
Morongo Valley, CA 92256

Registered Nurse License No. 467434

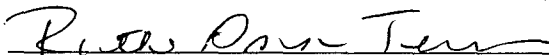
Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

It is so ORDERED on August 21, 2008.

This Decision shall become effective on August 21, 2008.


Ruth Ann Terry, Executive Officer
FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

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EXHIBIT "A"

Stipulated Settlement and Disciplinary Order No. 2005-34

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Alicia Bestwick
49373 Aspen Drive
Morongo Valley, CA 92256

Case No. 2005-34

OAH No. L2004110078

Registered Nurse License No. 467434

Respondent.

DECISION

The attached Proposed Decision of the Administrative Law Judge is hereby adopted by the Board of Registered Nursing as its Decision in the above-entitled matter.

This Decision shall become effective on July 18, 2005.

IT IS SO ORDERED June 17, 2005.

Sandra R. Erickson

President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 BILL LOCKYER, Attorney General
of the State of California
2 MARC D. GREENBAUM, State Bar No. 138213
Deputy Attorney General
3 California Department of Justice
300 So. Spring Street, Suite 1702
4 Los Angeles, CA 90013
Telephone: (213) 897-2579
5 Facsimile: (213) 897-2804

6 Attorneys for Complainant

7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

11 ALICIA BESTWICK
49373 Aspen Drive
12 Morongo Valley, CA 92256

13
14 Registered Nurse License No. 467434

15 Respondent.

Case No. 2005-34 and

OAH No. L-2004110078

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
18 above-entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of
21 the Board of Registered Nursing. She brought this action solely in her official capacity and is
22 represented in this matter by Bill Lockyer, Attorney General of the State of California, by
23 Marc D. Greenbaum, Deputy Attorney General.

24 2. Respondent Alicia Bestwick (Respondent) is represented in this
25 proceeding by attorney Edgardo Gonzalez, whose address is 1300 Clay Street, Suite 600,
26 Oakland, CA 94612.

27 3. On or about August 31, 1991, the Board of Registered Nursing issued
28 Registered Nurse License No. 467434 to Alicia Bestwick. The License was in full force and

1 effect at all times relevant to the charges brought in Accusation No. 2005-34 and and will expire
2 on December 31, 2004, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2005-34 and was filed before the Board of Registered
5 Nursing (Board) , Department of Consumer Affairs, and is currently pending against Respondent.
6 The Accusation and all other statutorily required documents were properly served on Respondent
7 on September 17, 2004. Respondent timely filed her Notice of Defense. A copy of Accusation
8 No. 2005-34 and is attached as exhibit A and incorporated herein by reference.

9 ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, fully discussed with counsel, and
11 understands the charges and allegations in Accusation No. 2005-34 and . Respondent has also
12 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
13 Settlement and Disciplinary Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the
15 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
16 counsel at her own expense; the right to confront and cross-examine the witnesses against her;
17 the right to present evidence and to testify on her own behalf; the right to the issuance of
18 subpoenas to compel the attendance of witnesses and the production of documents; the right to
19 reconsideration and court review of an adverse decision; and all other rights accorded by the
20 California Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
22 each and every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each and every charge and allegation in
25 Accusation No. 2005-34 and .

26 9. Respondent agrees that her Registered Nurse License is subject to
27 discipline and she agrees to be bound by the Board of Registered Nursing's imposition of
28 discipline as set forth in the Disciplinary Order below.

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1 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
2 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
3 and enforceable to the fullest extent permitted by law.

4 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.
5 A full and detailed account of any and all violations of law shall be reported by Respondent to
6 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
7 compliance with this condition, Respondent shall submit completed fingerprint forms and
8 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
9 as part of the licensure application process.

10 **Criminal Court Orders:** If Respondent is under criminal court orders, including
11 probation or parole, and the order is violated, this shall be deemed a violation of these probation
12 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

13 2. **Comply with the Board's Probation Program.** Respondent shall fully
14 comply with the conditions of the Probation Program established by the Board and cooperate
15 with representatives of the Board in its monitoring and investigation of the Respondent's
16 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
17 within no more than 15 days of any address change and shall at all times maintain an active,
18 current license status with the Board, including during any period of suspension.

19 Upon successful completion of probation, Respondent's license shall be fully
20 restored.

21 3. **Report in Person.** Respondent, during the period of probation, shall
22 appear in person at interviews/meetings as directed by the Board or its designated
23 representatives.

24 4. **Residency, Practice, or Licensure Outside of State.** Periods of
25 residency or practice as a registered nurse outside of California shall not apply toward a reduction
26 of this probation time period. Respondent's probation is tolled, if and when she resides outside
27 of California. Respondent must provide written notice to the Board within 15 days of any change
28 of residency or practice outside the state, and within 30 days prior to re-establishing residency or

1 returning to practice in this state.

2 Respondent shall provide a list of all states and territories where she has ever been
3 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
4 provide information regarding the status of each license and any changes in such license status
5 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
6 new nursing license during the term of probation.

7 **5. Submit Written Reports.** Respondent, during the period of probation,
8 shall submit or cause to be submitted such written reports/declarations and verification of actions
9 under penalty of perjury, as required by the Board. These reports/declarations shall contain
10 statements relative to Respondent's compliance with all the conditions of the Board's Probation
11 Program. Respondent shall immediately execute all release of information forms as may be
12 required by the Board or its representatives.

13 Respondent shall provide a copy of this Decision to the nursing regulatory agency
14 in every state and territory in which she has a registered nurse license.

15 **6. Function as a Registered Nurse.** Respondent, during the period of
16 probation, shall engage in the practice of registered nursing in California for a minimum of 24
17 hours per week for 6 consecutive months or as determined by the Board.

18 For purposes of compliance with the section, "engage in the practice of registered
19 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
20 work in any non-direct patient care position that requires licensure as a registered nurse.

21 The Board may require that advanced practice nurses engage in advanced practice
22 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the
23 Board.

24 If Respondent has not complied with this condition during the probationary term,
25 and Respondent has presented sufficient documentation of her good faith efforts to comply with
26 this condition, and if no other conditions have been violated, the Board, in its discretion, may
27 grant an extension of Respondent's probation period up to one year without further hearing in
28 order to comply with this condition. During the one year extension, all original conditions of

1 probation shall apply.

2 7. **Employment Approval and Reporting Requirements.** Respondent
3 shall obtain prior approval from the Board before commencing or continuing any employment,
4 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
5 performance evaluations and other employment related reports as a registered nurse upon request
6 of the Board.

7 Respondent shall provide a copy of this Decision to her employer and immediate
8 supervisors prior to commencement of any nursing or other health care related employment.

9 In addition to the above, Respondent shall notify the Board in writing within
10 seventy-two (72) hours after she obtains any nursing or other health care related employment.
11 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
12 terminated or separated, regardless of cause, from any nursing, or other health care related
13 employment with a full explanation of the circumstances surrounding the termination or
14 separation.

15 8. **Supervision.** Respondent shall obtain prior approval from the Board
16 regarding Respondent's level of supervision and/or collaboration before commencing or
17 continuing any employment as a registered nurse, or education and training that includes patient
18 care.

19 Respondent shall practice only under the direct supervision of a registered nurse
20 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
21 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
22 are approved.

23 Respondent's level of supervision and/or collaboration may include, but is not
24 limited to the following:

25 (a) Maximum - The individual providing supervision and/or collaboration is
26 present in the patient care area or in any other work setting at all times.

27 (b) Moderate - The individual providing supervision and/or collaboration is in
28 the patient care unit or in any other work setting at least half the hours Respondent works.

1 (c) Minimum - The individual providing supervision and/or collaboration has
2 person-to-person communication with Respondent at least twice during each shift worked.

3 (d) Home Health Care - If Respondent is approved to work in the home health
4 care setting, the individual providing supervision and/or collaboration shall have person-to-
5 person communication with Respondent as required by the Board each work day. Respondent
6 shall maintain telephone or other telecommunication contact with the individual providing
7 supervision and/or collaboration as required by the Board during each work day. The individual
8 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
9 site visits to patients' homes visited by Respondent with or without Respondent present.

10 9. **Employment Limitations.** Respondent shall not work for a nurse's
11 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a
12 traveling nurse, or for an in-house nursing pool.

13 Respondent shall not work for a licensed home health agency as a visiting nurse
14 unless the registered nursing supervision and other protections for home visits have been
15 approved by the Board. Respondent shall not work in any other registered nursing occupation
16 where home visits are required.

17 Respondent shall not work in any health care setting as a supervisor of registered
18 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
19 nurses and/or unlicensed assistive personnel on a case-by-case basis.

20 Respondent shall not work as a faculty member in an approved school of nursing
21 or as an instructor in a Board approved continuing education program.

22 Respondent shall work only on a regularly assigned, identified and predetermined
23 worksite(s) and shall not work in a float capacity.

24 If Respondent is working or intends to work in excess of 40 hours per week, the
25 Board may request documentation to determine whether there should be restrictions on the hours
26 of work.

27 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
28 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later

1 than six months prior to the end of her probationary term.

2 Respondent shall obtain prior approval from the Board before enrolling in the
3 course(s). Respondent shall submit to the Board the original transcripts or certificates of
4 completion for the above required course(s). The Board shall return the original documents to
5 Respondent after photocopying them for its records.

6 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
7 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
8 amount of one-thousand-five-hundred (\$1,500.00) dollars. Respondent shall be permitted to pay
9 these costs in 24 consecutive monthly payments beginning the effective date of this decision in
10 the amount of sixty-two dollars and fifty cents (\$62.50).

11 If Respondent has not complied with this condition during the probationary term,
12 and Respondent has presented sufficient documentation of her good faith efforts to comply with
13 this condition, and if no other conditions have been violated, the Board, in its discretion, may
14 grant an extension of Respondent's probation period up to one year without further hearing in
15 order to comply with this condition. During the one year extension, all original conditions of
16 probation will apply.

17 12. **Violation of Probation.** If Respondent violates the conditions of her
18 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
19 aside the stay order and impose the stayed discipline (revocation) of Respondent's license.

20 If during the period of probation, an accusation or petition to revoke probation has
21 been filed against Respondent's license or the Attorney General's Office has been requested to
22 prepare an accusation or petition to revoke probation against Respondent's license, the
23 probationary period shall automatically be extended and shall not expire until the accusation or
24 petition has been acted upon by the Board.

25 13. **License Surrender.** During Respondent's term of probation, if she ceases
26 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
27 probation, Respondent may surrender her license to the Board. The Board reserves the right to
28 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to

1 take any other action deemed appropriate and reasonable under the circumstances, without
2 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
3 will no longer be subject to the conditions of probation.

4 Surrender of Respondent's license shall be considered a disciplinary action and
5 shall become a part of Respondent's license history with the Board. A registered nurse whose
6 license has been surrendered may petition the Board for reinstatement no sooner than the
7 following minimum periods from the effective date of the disciplinary decision:

8 (1) Two years for reinstatement of a license that was surrendered for any
9 reason other than a mental or physical illness; or

10 (2) One year for a license surrendered for a mental or physical illness.

11 14. **Mental Health Examination.** Respondent shall, within 45 days of the
12 effective date of this Decision, have a mental health examination including psychological testing
13 as appropriate to determine her capability to perform the duties of a registered nurse. The
14 examination will be performed by a psychiatrist, psychologist or other licensed mental health
15 practitioner approved by the Board. The examining mental health practitioner will submit a
16 written report of that assessment and recommendations to the Board. All costs are the
17 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
18 result of the mental health examination will be instituted and followed by Respondent.

19 If Respondent is determined to be unable to practice safely as a registered nurse,
20 the licensed mental health care practitioner making this determination shall immediately notify
21 the Board and Respondent by telephone, and the Board shall request that the Attorney General's
22 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
23 practice and may not resume practice until notified by the Board. During this period of
24 suspension, Respondent shall not engage in any practice for which a license issued by the Board
25 is required, until the Board has notified Respondent that a mental health determination permits
26 Respondent to resume practice. This period of suspension will not apply to the reduction of this
27 probationary time period.

28 If Respondent fails to have the above assessment submitted to the Board within

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1 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
2 practice until notified by the Board. This period of suspension will not apply to the reduction of
3 this probationary time period. The Board may waive or postpone this suspension only if
4 significant, documented evidence of mitigation is provided. Such evidence must establish good
5 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
6 provided. Only one such waiver or extension may be permitted.

7 15. Therapy or Counseling Program. Respondent, at her expense, shall
8 participate in an on-going counseling program until such time as the Board releases her from this
9 requirement and only upon the recommendation of the counselor. Written progress reports from
10 the counselor will be required at various intervals.

11 ACCEPTANCE

12 I have carefully read the above Stipulated Settlement and Disciplinary Order and
13 have fully discussed it with my attorney, Edgardo Gonzalez. I understand the stipulation and the
14 effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and
15 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
16 Decision and Order of the Board of Registered Nursing.

17 DATED: 3-16-05

18 Alicia Bestwick
19 ALICIA BESTWICK
20 Respondent

21
22 I have read and fully discussed with Respondent Alicia Bestwick the terms and
23 conditions and other matters contained in the above Stipulated Settlement and Disciplinary
24 Order. I approve its form and content.

25 DATED: 3-16-05

26
27 Edgardo Gonzalez
28 EDGARDO GONZALEZ
Attorney for Respondent

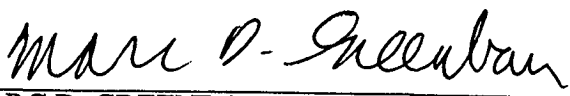
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: 3/22/05.

BILL LOCKYER, Attorney General
of the State of California


MARC D. GREENBAUM
Deputy Attorney General
Attorneys for Complainant

DOJ Matter ID: LA2004800622
50025523.2.wpd

Exhibit A
Accusation No. 2005-34 and

1 BILL LOCKYER, Attorney General
of the State of California
2 MARC D. GREENBAUM, State Bar No. 138213
Deputy Attorney General
3 California Department of Justice
300 So. Spring Street, Suite 1702
4 Los Angeles, CA 90013
Telephone: (213) 897-2579
5 Facsimile: (213) 897-2804

6 Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 2005-34

11 ALICIA BESTWICK
12 49373 Aspen Drive
Morongo Valley, CA 92256

A C C U S A T I O N

13 Registered Nursing License No. 467434

14 Respondent.

15
16 Complainant alleges:

17 **PARTIES**

18 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation
19 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
20 Department of Consumer Affairs.

21 2. On or about August 31, 1991, the Board of Registered Nursing issued
22 Registered Nursing License No. 467434 to Alicia Bestwick (Respondent). The Registered
23 Nursing License was in full force and effect at all times relevant to the charges brought herein
24 and will expire on December 31, 2004, unless renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board of Registered Nursing
27 (Board), Department of Consumer Affairs, under the authority of the following laws. All section
28 references are to the Business and Professions Code unless otherwise indicated.

1 4. Section 2750 states, in pertinent part:

2 "Every certificate holder or licensee, including licensees holding temporary
3 licenses, or licensees holding licenses placed in an inactive status, may be disciplined as provided
4 in this article [article 3, commencing with section 2750]. As used in this article, 'license' includes
5 certificate, registration, or any other authorization to engage in the practice regulated by this
6 chapter [chapter 6, commencing with section 2700]."

7 5. Section 2764 states:

8 "The lapsing or suspension of a license by operation of law or by order or decision
9 of the board or a court of law, or the voluntary suspension of a license by a licentiate shall not
10 deprive the board of jurisdiction to proceed with any investigation of or disciplinary proceeding
11 against such license, or to render a decision suspending or revoking such license."

12 6. Section 2811, subdivision (b), provides in pertinent part, that each license
13 not renewed in accordance with that section shall expire, but may within a period of eight years
14 thereafter be reinstated.

15 7. Section 2761 states:

16 "The board may take disciplinary action against a certified or licensed nurse or
17 deny an application for a certificate or license for any of the following:

18 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

19

20 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or
21 abetting the violating of, or conspiring to violate any provision or term of this chapter [chapter 6,
22 commencing with section 2700] or regulations adopted pursuant to it.

23

24 "(f) Conviction of a felony or of any offense substantially related to the
25 qualifications, functions, and duties of a registered nurse, in which event the record of the
26 conviction shall be conclusive evidence thereof.

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1 A. On or about September 17, 2002, Respondent was convicted on a plea of
2 guilty, for violating one count of Penal Code section 246.3
3 in the Superior Court of California, County of San Bernardino, Joshua Tree District,
4 Case No. FMB005424.

5 B. The circumstances surrounding the conviction are that on or about July 24,
6 2002, Respondent, willfully and unlawfully discharged a firearm in a grossly negligent manner,
7 which could have resulted in injury and death to a person.

8 SECOND CAUSE FOR DISCIPLINE

9 (Unprofessional Conduct)

10 12. Respondent is subject to discipline under sections 2761 subdivision (a) and
11 (d), for unprofessional conduct, in that on September 17, 2002, Respondent was convicted of a
12 crime substantially related to the qualifications, functions, or duties of a registered nurse, as more
13 fully set forth in paragraph 11 above.

14 PRAYER

15 WHEREFORE, Complainant requests that a hearing be held on the matters herein
16 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 17 1. Revoking or suspending Registered Nurse License No. 467434, issued to
18 Alicia Bestwick;
- 19 2. Ordering to pay the Board of Registered Nursing the reasonable costs of
20 the investigation and enforcement of this case, pursuant to Business and Professions Code
21 section 125.3;
- 22 3. Taking such other and further action as deemed necessary and proper.

23 DATED: 8/31/04

24 *Ruth Ann Terry*
25 RUTH ANN TERRY, M.P.H., R.N.
26 Executive Officer
27 Board of Registered Nursing
28 Department of Consumer Affairs
State of California
Complainant